

OF  
**WILLIAM E. OTTO, Esq.**

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May 18, 2022

The Honorable Harry F. Smail, Jr.  
Westmoreland County Courthouse  
2 N Main St  
Greensburg, PA 15601

**RE: Christine Biros v. U Lock, Inc.**  
**Westmoreland County Court of Common Pleas Case No. 17CJ04886**

Dear Judge Smail:

By letter dated May 11, 2022, I informed the below listed counsel of my intention to present additional evidence to you concerning motions in the above-captioned matter on May 20, 2022 at 9:00 a.m. or at such other time as you may direct.


As you are probably aware, an Involuntary Chapter 7 Petition has been filed against U Lock, Inc. by Shanni Snyder. Accordingly, the automatic stay provided by the Federal Bankruptcy Rules stays any action against U Lock during the stay. However, one of my motions before you is a request for sanctions not only against U Lock, but also against J. Allen Roth, Esq. and George Snyder and Kash Snyder. Since none of those individuals are affected by the Involuntary Chapter 7 filing against U Lock, I ask that you consider my Motion for Sanctions against those three individuals.

Mr. Roth has indicated his objection to the imposition of sanctions for his behavior because of his discharge of debt in his own bankruptcy case. I have attached the first page of Mr. Roth's bankruptcy petition to this letter as Attachment A. However, Mr. Roth's discharge, to the extent is effective in this matter, is only for his behavior prior to the date of his petition, October 17, 2019.

Many of Mr. Roth's actions took place after that date. As the record (and transcripts) show, the arguments on Mr. Roth's Post-Trial Motions took place in November, 2019. As a result, there is no discharge for those arguments or any of the appeals. On that basis, I ask that you consider my Motion for Sanctions against Mr. Roth, as well as the Snyder brothers.

If May 20, 2022 at 9:00 a.m. is inconvenient, I ask that your office inform me of a date which better suits your schedule.

Respectfully submitted,



William E. Otto, Esq.

WEO/dlj

CC: J. Allen Roth, Esq.  
John Tumolo, Esq.  
Dennis Del Cotto, Esq.

Fill in this information to identify your case:

United States Bankruptcy Court for the:

WESTERN DISTRICT OF PENNSYLVANIA

Case number (if known) \_\_\_\_\_

Chapter you are filing under:

☒ Chapter 7

☐ Chapter 11

☐ Chapter 12

☐ Chapter 13

☐ Check if this is an amended filing

## Official Form 101

# Voluntary Petition for Individuals Filing for Bankruptcy

12/17

The bankruptcy forms use you and Debtor 1 to refer to a debtor filing alone. A married couple may file a bankruptcy case together—called a *joint* case—and in joint cases, these forms use you to ask for information from both debtors. For example, if a form asks, "Do you own a car," the answer would be yes if either debtor owns a car. When information is needed about the spouses separately, the form uses *Debtor 1* and *Debtor 2* to distinguish between them. In joint cases, one of the spouses must report information as *Debtor 1* and the other as *Debtor 2*. The same person must be *Debtor 1* in all of the forms.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

### Part 1: Identify Yourself

#### About Debtor 1:

#### 1. Your full name

Write the name that is on your government-issued picture identification (for example, your driver's license or passport).

Bring your picture identification to your meeting with the trustee.

**John**

First name

**Allen**

Middle name

**Roth**

Last name and Suffix (Sr., Jr., II, III)

#### About Debtor 2 (Spouse Only in a Joint Case):

First name

Middle name

Last name and Suffix (Sr., Jr., II, III)

#### 2. All other names you have used in the last 8 years

Include your married or maiden names.

**J. Allen Roth**  
**Allen Roth**

#### 3. Only the last 4 digits of your Social Security number or federal Individual Taxpayer Identification number (ITIN)

**xxx-xx-3783**

ATTACHMENT  
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